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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 ALLAN CANDELORE, On Behalf of Himself)
13 and All Others Similarly Situated,)

14 Plaintiff,)

15 vs.)

16 LDK SOLAR CO., LTD., et al.,)

17 Defendants.)

No. C-07-05182-WHA

CLASS ACTION

18 THOMAS O' REILLY,)

19 Plaintiff,)

20 vs.)

21 LDK SOLAR CO., LTD., et al.,)

22 Defendants.)

No. C-07-05205-CRB

CLASS ACTION

23 [Caption continued on following page.]

24 **STIPULATION AND ~~PROPOSED~~ ORDER CONSOLIDATING RELATED**
25 **ACTIONS AND DEFERRING RESPONSE DATE**
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1	FREDRICK GRENWALD, individually and)	No. C-07-05259-MHP
	on Behalf All Others Similarly Situated,)	
2)	<u>CLASS ACTION</u>
	Plaintiff,)	
3)	
	vs.)	
4)	
	LDK SOLAR CO., LTD., et al.,)	
5)	
	Defendants.)	
6)	
	_____)	
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1 WHEREAS, there are currently three related securities class action lawsuits instituted on
2 behalf of the stockholders of LDK Solar Co. Ltd. (“LDK”) pending in this District;

3 WHEREAS, consolidation of these related actions will promote judicial economy, avoid
4 duplicative law and motion and discovery proceedings, and streamline adjudication of these related
5 matters;

6 WHEREAS, a lead plaintiff has not yet been appointed pursuant to 15 U.S.C. §78u
7 4(a)(3)(B) of the Securities Exchange Act of 1934;

8 WHEREAS, LDK and LDK Solar USA, Inc., through their counsel of record indicated
9 below, have agreed to waive process of service without waiving any challenges as to jurisdiction or
10 venue; and

11 WHEREAS, the agreed-upon schedule is not for the purpose of delay, promotes judicial
12 efficiency, and will not cause prejudice to either party,

13 IT IS HEREBY STIPULATED by the parties, through their counsel of record, that:

14 1. The following actions are hereby consolidated for all purposes, including pretrial
15 proceedings, trial and appeal, pursuant to Fed. R. Civ. P. 42(a):

Abbreviated Case Name	Civil Case No.	Date Filed
<i>Candelore v. LDK Solar Co., Ltd., et al.</i>	07cv05182	10/09/07
<i>O'Reilly v. LDK Solar Co., Ltd., et al.</i>	07cv05205	10/11/07
<i>Greenwald v. Peng, et al.</i>	07cv05259	10/16/07

18 2. The caption of these consolidated cases shall be “*In re LDK Solar Securities*
19 *Litigation*” and the files of this action shall be maintained in one file under Master File
20 No. C-07-05182-WHA. Any other actions now pending or hereafter filed in this District which arise
21 out of the same facts and claims as alleged in these related actions shall be consolidated for all
22 purposes, if and when they are brought before this Court and the Court accepts the transfer and
23 approves consolidation;

24 3. Without waiving any challenges to jurisdiction or venue, LDK and LDK Solar USA,
25 Inc., through their counsel of record indicated below, agree to waive process of service;
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4. Every pleading filed in the consolidated actions, or in any separate action included herein, shall bear the following caption:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE LDK SOLAR SECURITIES LITIGATION)	Master File No. C-07-05182- WHA
)	
This Document Relates to:)	
)	
)	<u>CLASS ACTION</u>
)	
)	

5. When a pleading is intended to apply to all actions governed by this Order, the words "All Actions" shall appear immediately after the words "This Document Relates to:" in the caption set out above. When a pleading is intended to apply only to some, but not all of the consolidated actions, this Court's docket number for the individual action to which the document applies along with the last name of the first-listed plaintiff in said action shall appear immediately after the words "This Document Relates to:" in the caption described above;

6. From the date of entry of this Order, the parties shall comply with 15 U.S.C. §78u-4(b)(3)(C)(i), without regard to whether a stay under 15 U.S.C. §78u-4(b)(3)(B) is in effect, and shall comply with 15 U.S.C. §78u-4(b)(3)(C)(i) provisions concerning documents, including, but not limited to, electronic documents and e-mail, relevant to allegations contained in any and all of the pleadings in these actions, including any consolidated class action complaint;

7. Within 20 days of the appointment of a lead plaintiff and lead counsel in the consolidated action, lead plaintiff shall designate one of the complaints operative or establish a schedule for filing a consolidated complaint which shall be the operative complaint and which shall supercede all previously filed complaints. Defendants need not respond to any preceding complaints. Lead plaintiff and defendants shall also negotiate a briefing schedule on defendants' anticipated motion to dismiss the operative complaint;

8. The parties shall effect service of papers filed with the Court on opposing counsel by overnight mail service, hand delivery, or facsimile, unless otherwise agreed. After the Court appoints lead plaintiff's counsel, defendants may serve all plaintiffs' counsel who are not appointed

as lead counsel by regular mail, but must continue to serve lead plaintiff's counsel by overnight mail service, hand delivery, or facsimile.

IT IS SO STIPULATED.

DATED: November 6, 2007

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s/ MARY K. BLASY
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DATED: November 6, 2007

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12 DATED: November 6, 2007

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19 Attorneys for Defendants LDK Solar Co., Ltd.,
20 LDK Solar USA, Inc., Xiaofeng Peng, XingXue
Tong, and Jack Lai

21 **ORDER**

22 IT IS SO ORDERED.

23 DATED: November 7, 2007

24 THE HONORABLE WILLIAM H. ALSUP
25 UNITED STATES DISTRICT JUDGE



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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 6, 2007.

s/ MARY K. BLASY

MARY K. BLASY

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Mailing Information for a Case 3:07-cv-05182-WHA

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Mary K. Blasy**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)